

# **EXHIBIT A**



**U.S. Department of Justice**

*United States Attorney  
Southern District of New York*

*The Silvio J. Mollo Building  
One Saint Andrew's Plaza  
New York, New York 10007*

November 2, 2017

By FEDEX

Matthew Lane Schwartz  
Boies, Schiller & Flexner LLP  
575 Lexington Avenue  
New York, NY 10022  
*Counsel for Devon Archer*

**Re: United States v. Jason Galanis, et al.,  
S1 16 Cr. 371 (RA)**

Dear Mr. Schwartz:

This letter provides supplemental discovery pursuant to Rule 16(a) of the Federal Rules of Criminal Procedure ("Fed. R. Crim. P."). Based on your request for discovery in this case, enclosed please find 1 USB flash drive containing Confidential Material in the form of e-mails obtained pursuant to a search warrant (16 Mag. 8347) for email accounts belonging to Devon Archer, Bevan Cooney, and Sebastian Momtazi. These documents bear the following Bates ranges pr.review.archer\_00000001-00020819 and pr.review.joint\_00000001-00000639 (the "Reviewed Materials").<sup>1</sup> More specifically, the Reviewed Materials consist of documents reviewed by the Government's privilege team in this matter (the "Filter Team") and which the Filter Team has designated as either Not Privileged or subject to the crime-fraud exception of the attorney-client privilege.

Documents with Bates range pr.review.archer\_00000001-00019666 and pr.review.joint\_00000001-00000530 are the documents that the Filter Team has designated as Not Privileged. As agreed at the pretrial conference on October 26, 2017, these documents will not be released to the investigative team until you have had an opportunity to review them. Please let me know by November 20, 2017, which documents, if any, you intend to assert are privileged. With respect to each such document, please provide a privilege log setting forth the nature of the privilege, including the attorney, the client (if an entity, please provide your client's relationship to the entity as well as the relationship of any other individuals included on the

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<sup>1</sup> Documents with the Bates prefix pr.review.joint consist of emails that sent or received by both Archer (or Momtazi) and Cooney. These emails are also being provided to counsel for Cooney. Document with the Bates prefix pr.review.archer consist of communications sent or received by Archer or Momtazi. These emails are not being provided to counsel for Cooney

communication to the entity) and any other information sufficient to evaluate the existence of the privilege so that we can come to a consensus without the Court's assistance.

Documents with Bates range pr.review.archer\_00019667-00020819 and pr.review.joint\_00000531-00000639 are the documents that the Filter Team has designated as potentially falling within the crime-fraud exception. The Filter Team will not be providing these documents (or any other documents potentially subject to the crime-fraud exception) to the investigative team until there is an agreement or judicial determination with respect to the applicability and scope of the crime-fraud exception.

Please also let me know as soon as possible if you have any difficulty accessing these materials or have any questions.

Very truly yours,

JOON H. KIM  
Acting United States Attorney

By: /s/ Lisa P. Korologos  
Lisa P. Korologos  
Assistant United States Attorney  
Tel: (212) 637-2406

cc: Silvia Serpe, Esq. (via email, w/o attachments)  
*Counsel for Sebastian Momtazi*